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DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES
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OCT 12 1988

PRELIMINARY ENVIRONMENTAL REVIEW

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Division/Bureau Environmental Sciences Division/Solid & Hazardous Waste Bureau
Project or Application Burlington Northern Railroad, Paradise Tie Treating Plant Waste
Pile, Draft Hazardous Waste Permit No. MTHWP-88-03
Description of Project The Solid & Hazardous Waste Bureau has drafted a comprehensive
permit for continued storage of creosote-contaminated soils in a lined and covered
waste pile at the former tie plant. The waste pile was built in 1985 and has operated
under a temporary or interim status permit since then. The comprehensive permit
imposes additional monitoring and operating requirements.
Temporary storage in the waste pile is the first step in a long-term process to
clean up and close out wastes produced by BN's historic tie treating processes. No
new wastes will be generated. See attached fact sheet and comments.

POTENTIAL IMPACT ON PHYSICAL ENVIRONMENT

	Major	Moderate	Minor	None	Unknown	Comments on Attached Pages
1. Terrestrial & aquatic life and habitats			X			X
2. Water quality, quantity and distribution		X				X
3. Geology & soil quality, stability and moisture			X			X
4. Vegetation cover, quant- ity and quality			X			X
5. Aesthetics		X				X
6. Air quality			X			X
7. Unique, endangered, fragile, or limited environmental resources			X			X
8. Demands on environmen- tal resources of land, water, air & energy			X			X
9. Historical and archaeo- logical sites					X	X

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SECRET

POTENTIAL IMPACTS ON HUMAN ENVIRONMENT

	Major	Moderate	Minor	None	Unknown	Comments on Attached Pages
1. Social structures and mores				X		
2. Cultural uniqueness and diversity				X		
3. Local and state tax base & tax revenue				X		
4. Agricultural or industrial production				X		
5. Human health			X			
6. Quantity and distribution of community and personal income				X		
7. Access to and quality of recreational and wilderness activities				X		
8. Quantity and distribution of employment				X		
9. Distribution and density of population and housing				X		
10. Demands for government services				X		
11. Industrial & commercial activity				X		
12. Demands for energy				X		
13. Locally adopted environmental plans & goals				X		
14. Transportation networks & traffic flows			X			

Other groups or agencies contacted or which may have overlapping jurisdiction Environmental Protection Agency, Water Quality

Bureau

Individuals or groups contributing to this PER. Barbara Jones, Alice Stanley

Recommendation concerning preparation of EIS not recommended; the process of preparing a comprehensive permit application addresses physical environmental concerns

PER Prepared by: Barbara Jones, Alice Stanley

Date: September 23, 1988



September 23, 1988

COMMENTS
PRELIMINARY ENVIRONMENTAL REVIEW

POTENTIAL IMPACT ON PHYSICAL ENVIRONMENT

1. Terrestrial and aquatic life and habitats: For almost seventy-five years (from 1980 until 1982) creosote contaminated waste water was discharged into an abandoned meander channel of the Clark Fork River. When the waste pile was built in 1985, contaminated soils were taken out of the slough and put in a lined and covered waste pile. Removal of heavily contaminated soils from the slough probably provided a minor improvement in habitat for terrestrial or aquatic species living in or near the slough.

The Department is concerned that the waste pile is located in the hundred year floodplain of the Clark Fork River. The draft permit requires the Permittee to provide riprap protection of all waste pile dike faces that are within the 100-year floodplain, to protect against washout in the event of a flood.

2. Water quality, quantity, and distribution: Removal of contaminated soils from the slough and placement in the waste pile will ultimately lead to improvement in groundwater quality, because most of the contamination source has been removed. Groundwater is known to be contaminated due to historic use of the slough for waste disposal. A network of wells around both the slough and waste pile will be monitored four times a year for creosote constituents to check for changes in groundwater quality. A groundwater cleanup program will be initiated within the next several months.

3. Geology and soil quality, stability, and moisture: Removal of the wastes from the slough into the waste pile led to a minor improvement in soil quality in the slough.

4. Vegetation cover, quantity, and quality: Although construction of the waste pile was temporarily disruptive to vegetation cover in the area, borrow areas were regraded and reseeded. When the waste pile is closed (no later than November 1, 1995) that area will also be regraded and reseeded.

5. Aesthetics: The waste pile is an aesthetic improvement to the creosote contaminated slough. However, the waste pile still has a minor detrimental impact on the aesthetics of the area, because of its industrial appearance.

6. Air quality: Excavation and placement of contaminated soils in the waste pile will have a minor air quality impact for persons working near the waste pile, due to volatile organics in the contaminated wastes. The waste pile cover will minimize air quality impacts.

7. Unique, endangered, fragile, or limited environmental resources: Storage of contaminated wastes in the waste pile rather than the slough



has probably afforded some minor habitat improvement for environmental resources in the area, such as raptors.

8. Demands on environmental resources of land, water, air, and energy: Use of the former BN tie treating for hazardous waste storage precludes agricultural or other use of the area through the post-closure period. However, the overall closure process will ultimately lead to environmental improvement.

9. Historical and archeological sites: The impact of current waste management practices on the historic or archeological resources of the site is unknown. Industrial use of the area over the last several decades has probably damaged any resources that may have been at the site. Issuance of a comprehensive permit will not have any additional impact.

POTENTIAL IMPACTS OF HUMAN ENVIRONMENT

1-4, 6-13: Social, cultural, economic, and industrial impact: Issuance of a comprehensive permit will not have an impact on most aspects of social, cultural, or economic activities for the Paradise community. The tie treating plant was closed in 1982, and therefore industrial activity will not be affected.

5. Human health: Regulating hazardous waste management and closure activities at Paradise through a comprehensive permit may improve human health in the community at large. Conditions written into the permit will lead to groundwater cleanup, closure, and protection against accidental releases.

7. Transportation networks and traffic flow: Construction and waste hauling may increase traffic in and around the former tie treating plant during some periods.



FACT SHEET
FOR A DRAFT HAZARDOUS WASTE MANAGEMENT FACILITY PERMIT
BURLINGTON NORTHERN RAILROAD
PARADISE TIE TREATING PLANT
PARADISE, MONTANA
EPA ID. NO. MTD00071687

This fact sheet is for the Environmental Protection Agency's (EPA's) portion of the full draft Resource Conservation and Recovery Act (RCRA) permit which EPA and the State of Montana intend to issue to Burlington Northern Railroad, for operation of its hazardous waste pile located at Paradise, Montana. The full RCRA permit is comprised of EPA's permit, which addresses the provisions of the Hazardous and Solid Waste Amendments of 1984 (HSWA), and the State of Montana's permit, which addresses that portion of RCRA for which the State of Montana is authorized. Some of the provisions in the EPA portion of the permit are also included in the Montana State portion of the permit, since the State of Montana is in the process of amending its hazardous waste regulations to include relevant HSWA requirements. The State of Montana is authorized to administer and enforce those portions of RCRA in effect prior to the enactment of HSWA. This fact sheet was prepared in accordance with the requirements of 40 CFR 124.8.

A. PURPOSE OF THE PERMIT ISSUANCE PROCESS

The purpose of the permit issuance process is to afford the United States Environmental Protection Agency, interested citizens and other governmental agencies the opportunity to evaluate the ability of the Permittee to comply with the applicable requirements promulgated under the Resource Conservation and Recovery Act, as amended by the Hazardous and Solid Waste Amendments of 1984. EPA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply with during the duration of the permit. The public is given forty-five (45) days to review and comment on the draft permit conditions prior to EPA taking any final action on EPA's draft permit.



B. PROCEDURES FOR REACHING A FINAL DECISION

Section 7004(b) of RCRA and 40 C.F.R. 124.10 require that the public be given forty-five (45) days to comment on each draft permit prepared under the Resource Conservation and Recovery Act. The comment period will begin on September 23, 1988 and will end on November 7, 1988. Any person interested in commenting on this draft permit must do so within this forty-five (45) day comment period.

All persons wishing to comment on any of the permit conditions should submit the comments in writing to the Environmental Protection Agency (EPA), Region VIII, Montana Office, 301 S. Park, Drawer 10096, Helena, Montana 59626, or to the address in the State permit. Comments should include all reasonably available references, factual grounds and supporting material.

A public hearing will be held at the Paradise School in Paradise, Montana on November 2, 1988 at 7:00 pm to receive comments on the draft permit.

When making a determination regarding the issuance of this permit to Burlington Northern Railroad, EPA will consider all written comments received during the comment period; oral or written statements received during the public hearing; the requirements of the hazardous waste regulations of 40 C.F.R. Parts 124, 260 through 264, and 270; the Agency's permitting policies; and the HSWA.

When EPA makes a final permit decision to either issue, deny or modify this permit, notice will be given to the applicant and each person who submitted written comments or requested notice of the final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review is requested under 40 C.F.R. 124.19. If no comments requested a change in this draft permit, the final permit shall become effective immediately upon issuance.

Contact person for the Burlington Northern Railroad Paradise Treating Tie Plant draft permit is:

Mr. Jim Harris
U.S. Environmental Protection Agency
Montana Office
301 S. Park, Drawer 10096
Helena, Montana 59626
[406] 449-5414



C. HAZARDOUS AND SOLID WASTE AMENDMENTS

CONTINUING RELEASES AT PERMITTED FACILITIES

Background

One of the most important provisions of the Hazardous and Solid Waste Amendments of 1984 is the requirement for corrective action for continuing releases. This provision is established in Section 3004(u) of RCRA, promulgated as regulation of 40 C.F.R. 264.101, 50 Federal Register 28747 (July 15, 1985), as follows:

"Standards promulgated under this section shall require, and a permit issued after November 8, 1984 (the date of enactment of the Hazardous and Solid Waste Amendments of 1984) by the Administrator or a State shall require corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under Section 3005 (of RCRA) shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."

The intent of Congress in establishing this permit requirement was to correct a perceived shortcoming in the existing statute and RCRA regulations, which allowed operating permits to be issued to facilities at which environmental contamination is occurring or has occurred, without the permit addressing that contamination. All permit applicants must now (a) identify all solid waste management units (SWMUs) at the facility, (b) identify any releases that have occurred or are occurring from those units, (c) take appropriate corrective action to clean up those releases, and (d) demonstrate financial assurance for those corrective actions. The provision on continuing releases was effective on the date of enactment (November 8, 1984). Thus, a permit issued after that date must address this provision.



The basic standard for imposing corrective action at the Paradise Tie Treating Plant is protection of human health and the environment. The EPA permit will address corrective action when there is or has been a probable release at the facility that poses a threat to human health and the environment. A substantial threat to human health and environment is assumed if there is a likelihood of a hazardous waste or hazardous constituent release from a solid waste management unit into the air, surface water, ground water, or soil.

Implementation

The process of implementing Section 3004(u) will take place in three stages, with each stage consisting of several specific steps, as follows:

1. Assessment of need for corrective action (RCRA Facility Assessment).
 - a. Submission of Preliminary Review information by applicant.
 - b. Evaluation of Preliminary Review information submitted by applicant to determine the possibility or extent of releases.
 - c. Performance of a Visual Site Inspection by the Agency.
2. Existing data evaluation and development of proposed programs of corrective action.
 - a. Verification Investigation by owner/operator to identify or verify releases.
 - b. RCRA Facility Investigation, if necessary, by owner/operator to characterize releases.
 - c. Development of a proposed program of corrective measures, if necessary, and cost estimate.
3. Selecting and performing corrective action.
 - a. Establishing the program for corrective action.
 - b. Demonstration of financial assurance.
 - c. Conducting corrective action.



Information on solid waste management units was developed from state and federal files reviewed by the Agency. This included review of past RCRA Part B application submittals and inspection reports. A Visual Site Inspection was performed at the Paradise Tie Treating Plant on June 29, 1988. This permit contains conditions requiring Burlington Norther Railroad to perform an evaluation of existing solid waste management units and other areas of concern. Once this is completed, EPA will evaluate the completed studies and determine if further action is warranted. If EPA finds that further studies and/or corrective measures are warranted, EPA will propose a permit modification and follow appropriate procedures which will include a public notice period and a public hearing, if requested.

OTHER PROVISIONS

A number of other provisions in HSWA became effective November 8, 1984. Provisions concerning the standards for owners and operators of hazardous waste management facilities and provisions concerning general permit conditions were promulgated as final regulations on July 15, 1985 (50 Fed. Reg. 28742). Two provisions, in addition to that pertaining to corrective actions for continuing releases, apply to this permit.

Section 3005(h) of RCRA (Section 224 of HSWA) requires that, as of September 1, 1985, Permittees of hazardous waste management facilities located on the premises of the generator must certify that certain waste minimization practices have been established. This requirement has been incorporated into the regulations concerning the Operating Record of the facility [40 C.F.R. 264.73(b)(9)] (see Permit Condition I.F.). Regulation 40 C.F.R. 270.30(j)(2), 50 Fed. Reg. 18752 (July 15, 1985), was revised to clarify that this operating standard must be a condition of the Permit (see Permit Conditions I.H.2 and I.I.7.b.).

This permit also addresses the relevant provisions of 40 CFR 268, restrictions on the land disposal of hazardous wastes. If the Permittee generates a hazardous waste subject to land disposal restrictions, the waste must be tested using the test method applicable to the specific waste in accordance with 40 CFR 268 Subpart C or by using knowledge of the waste to determine if the waste is restricted from land disposal.



D. FACILITY DESCRIPTION

GENERAL

The Burlington Northern Railroad Paradise Tie Treating Plant covers approximately 150 acres of valley floor on the flood plain of the Clark Fork River, approximately one-half northwest of Paradise, Montana. The facility is located at latitude 47° 23' 30" North and longitude 114° 48' 30" West.

The facility was used by Burlington Northern from approximately 1908 until 1982 to treat wooden railroad ties with creosote. In October 1982, the retort shed at the tie treating plant was destroyed by fire, and operations at the facility ceased. During wood treating operations, wastewater from the retort shed was discharged via an underground pipeline to an unlined, abandoned channel of the Clark Fork River, which was used as a wastewater impoundment. When plant operations ceased in 1982, this RCRA regulated impoundment was no longer used for wastewater storage. The impoundment was closed in 1985, with the sludge removed offsite and contaminated soil was placed in a RCRA-regulated waste pile. The waste pile is a temporary storage unit for the creosote-contaminated soil, which will eventually be treated in a proposed, onsite land treatment area.

WASTES GENERATED

The Burlington Northern Paradise Tie Treating Plant used creosote for treating railroad ties. The only listed waste generated was K001, which is described in 40 CFR 261 as bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.

Burlington Northern has initiated closure activities that have included the removal and reclamation of creosote-containing sludges at the Burlington Northern Tie Treating Plant at Somers, Montana. After removal of the reclaimable sludge, creosote-contaminated soil was excavated from the unit and placed in the waste pile that is the subject of this draft permit.



SOLID WASTE MANAGEMENT UNITS

As part of the RCRA permit, EPA Region VIII proposes to regulate solid waste management units subject to the corrective action provision of HSWA. Solid waste management units (SWMUs) are any active or inactive unit at the facility from which hazardous waste or hazardous waste constituents might migrate, irrespective of when waste was placed in the unit or whether that unit was intended for the management of solid and/or hazardous wastes.

EPA Region VIII has completed a preliminary evaluation of the SWMUs at the facility based on (1) the RCRA permit application and related correspondence; (2) a Visual Site Inspection conducted on June 29, 1988 by representatives of EPA Region VIII; (3) a RCRA Facility Assessment report prepared by EPA Region VIII; and (4) RCRA Facility Assessment Guidance dated October 1986.

Twenty-two SWMU's and one area of concern were defined during this process. Included in the 22 SWMU's are the RCRA regulated units and land treatment demonstration plots. The name and identifying number of the SWMU's and areas of concern are given in Table 1. Figure 1 illustrates the approximate location of the SWMU's on the facility.

E. PERMIT ORGANIZATION

The permit is divided into two parts as outlined below:

<u>Part</u>	<u>Topic</u>
I	Standard Conditions
II	Specific Conditions

Part I contains conditions which apply to all hazardous waste facilities. Part II pertains specifically to the hazardous waste facilities at the Burlington Northern Railroad Paradise Tie Treating Plant. Both Parts I and II are administered by EPA.

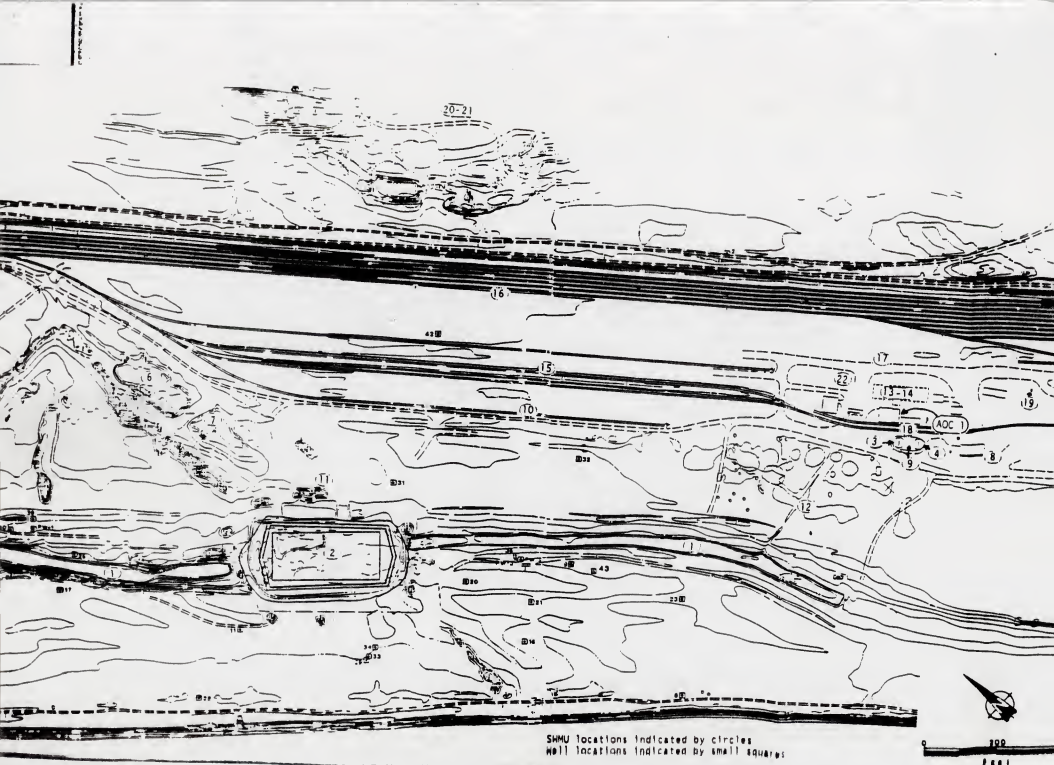


TABLE I

SOLID WASTE MANAGEMENT UNITS AND AREA OF CONCERN
BURLINGTON NORTHERN TIE TREATING PLANT
PARADISE, MONTANA

<u>SWMU No.</u>	<u>Unit Name</u>
1	Surface Impoundment
2	Waste Pile
3-4	Leachate Storage Tanks (2)
5	Land Treatment Demonstration Test Plots
6-7	Open Dumps (2)
8	Soil Drums
9	Creosote Sludge Drums
10	Retaining Wall and Adjacent Track
11	Leachate Tank Truck
12	Former Wastewater Pipe
13-14	Retort Building and Horizontal Tank
15	Former Drip Track Area
16	Product Storage Area
17	Former Sludge Disposal Area
18	Former Tank Car Unloading Area
19	Brick Incinerator
20-21	Roundhouse and Sewer Pipe
22	Scrap Debris Piles
<u>AOC No.</u>	
1	Boiler Building





SWMU locations indicated by circles
Well locations indicated by small squares

Figure 1 SWMU Location Map
North Arrow
Scale: 1 inch = 100 feet



DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES



TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 59620

FACT SHEET BURLINGTON NORTHERN RAILROAD PARADISE TIE TREATING PLANT WASTE PILE HAZARDOUS WASTE FACILITY DRAFT PERMIT September 23, 1988

BACKGROUND

In 1976, Congress enacted the Resource and Conservation and Recovery Act, also known as RCRA. In 1984, the Solid and Hazardous Waste Bureau of the Montana Department of Health and Environmental Sciences (DHES) was authorized by the federal Environmental Protection Agency (EPA) to manage the hazardous waste program in Montana. The act gives the DHES and EPA authority to manage hazardous wastes by:

- (1) Developing standards to be followed by generators, transporters, and facilities which treat, store, and dispose of hazardous waste;
- (2) Allowing enforcement of regulatory standards for such facilities through a permitting process.

REGULATORY HISTORY

Burlington Northern Railroad (BN) operated a tie treating plant near the town of Paradise from 1908 until October, 1982. Waste water from the creosote treating process was discharged over the years into an unlined slough, which was an abandoned channel of the Clark Fork River. In November, 1980, BN filed notice with EPA for an "interim status", or temporary permit, to store hazardous creosote wastes resulting from the waste water discharge in the slough, or surface impoundment. The temporary permit required BN to inform EPA of the amount and type of hazardous waste generated and processed, to describe and map the facility, and to issue annual updates. Installation of a groundwater monitoring system for the surface impoundment was also required.

When the retort building at the plant burned in October, 1982, BN ceased tie treating operations and no longer discharged waste water to the surface impoundment.

In September, 1983, EPA and DHES sent a notice to BN requesting a RCRA Part B permit application, or comprehensive permit application, for the surface impoundment, to be submitted by July 10, 1984.



In a letter dated February 2, 1984, BN notified EPA and DHES that they intended to close, rather than permit, the RCRA regulated surface impoundment. They asked the regulating authorities to "recall, revoke, or otherwise waive" the requirement to submit a Part B permit application. They also requested a waiver for the 90 day closure period specified in the regulations. DHES and EPA responded that although a Part B application would not be required, updated closure and post-closure plans would be necessary.

As an initial closure activity, BN recovered through pumping about 500,000 gallons of creosote from the impoundment. The creosote was reused in the tie treating process at the BN Somers tie plant.

CLOSURE PLAN

In March, 1985, BN submitted a comprehensive closure plan for the Paradise surface impoundment. The plan outlined steps to:

- 1) Construct a double-lined waste pile for temporary storage of contaminated soils from the impoundment;
- 2) Provide ultimate treatment of wastes through land treatment or incineration;
- 3) Conduct a ground water corrective action program.

Hazardous waste regulations do not allow major changes amounting to reconstruction at interim status facilities (40 CFR 270.72, ARM 16.44.610(5)). Reconstruction occurs when the capital investment in the changes to the facility exceeds fifty percent of the capital cost of a comparable, entirely new facility. Upon review of the plan, Burlington Northern and DHES agreed that installation of the waste pile, land treatment area, and incinerator would constitute reconstruction, and that a hazardous waste facility permit would be required.

A change in regulations also prompted a change in post-closure management approach at Paradise. The federal regulations were amended on July 15, 1985 (50 FR 28746). 40 CFR 264.90(a) was modified to specify that a hazardous waste surface impoundment receiving wastes after July 26, 1982 would be a "regulated unit". Such a unit would have to comply with permitting requirements by characterizing and responding to releases of hazardous constituents to groundwater. Because contamination of groundwater with creosote constituents had been discovered in the area of the surface impoundment, post-closure groundwater clean up activities would have to be incorporated into the permit.

REQUIRED PERMIT

Because of the large volume of wastes, the extended time period required for closure, and Burlington Northern's desire for on-site treatment, an interim status closure for the Paradise facility is not possible. Instead, closure and post-closure will be accomplished through the issuance of up to four separate but interrelated permit "modules" or chapters. The first activity to be permitted is storage of creosote contaminated soils in a lined and covered waste pile, which is the subject of today's draft permit.



Clean up or corrective action of contaminated groundwater near the old surface impoundment, and land treatment of creosote contaminated soils at the plant site, are two additional activities that Burlington Northern wishes to incorporate into the permit within the next several months. Burlington Northern has also submitted plans for on-site incineration of creosote-contaminated soils, although this is regarded as a second option in the event that land treatment is not allowed. Before land treatment, groundwater corrective action, or incineration activities are permitted at Paradise, the public will receive notice and have 45 days to review the information and comment.

WASTE PILE DRAFT PERMIT

Facility Description

The waste pile to be permitted was constructed at the Paradise tie plant facility in late 1985, and has been operating under a temporary, or interim status, permit. The comprehensive permit proposed today will impose additional monitoring and operational requirements.

The waste pile was constructed within the area of the old surface impoundment. It was built on a soil foundation, and was lined with two layers of a heavy duty polyethylene material. About 15,500 cubic yards of creosote contaminated soils were excavated from the old surface impoundment in the fall of 1985 and placed in the waste pile. The intent was to remove the creosote wastes from an area where they were causing continuing groundwater contamination, and place them in a unit where they would no longer be a contamination source.

Permitted Wastes

About 3,000 cubic yards out of the total of 18,500 yards of contaminated soil now in the waste pile were a result of clean up activities at another former BN tie treating plant at Somers, Montana. As waste pile capacity becomes available, Burlington Northern is required under the draft permit to place highest priority on storage of additional contaminated soils from Paradise. Soils from Somers will be accepted only as capacity allows.

Monitoring and Inspections

In 1986, a leak detection system placed between the waste pile liners detected leakage of water from the contaminated soils below the first liner. BN is required under the draft permit to check for leakage weekly and to pump out accumulated water.

A network of 10 ground water monitoring wells has been placed at the down gradient boundary of the waste pile and the former slough, or surface impoundment. BN is required under the draft permit to sample the wells four times a year for numerous creosote constituents. Weekly inspection of the waste pile cover, berms, drainage ditches, and sumps is required under the draft permit.

General Conditions

All conditions of the draft permit are based on requirements in Title 16, Chapter 44, Administrative Rules of Montana. These rules, which mirror federal



requirements for obtaining a permit to operate a hazardous waste management facility, are adopted under the Montana Hazardous Waste Act (MHWHA). MHWHA was enacted to implement in Montana the federal hazardous waste program established by RCRA. The permit application, consisting of parts A and B, serves as a basis for the conditions in this draft permit. The facility must be operated as specified in the application and in the conditions of this permit to be in compliance. Permit noncompliance could result in enforcement action or permit termination.

Term of the Permit

The draft permit states that under no conditions shall the waste pile be allowed to operate beyond November 1, 1995. However, Federal land disposal restrictions, which include land storage of wastes, may require Burlington Northern to close the waste pile before this date.

PUBLIC PARTICIPATION

MHWHA provides for a 45-day period for public comment on each draft permit or permit modification. The public comment period will extend through November 7, 1989. A notice will be published in the Missoulian, the Interlake, the Sanders County Ledger, and the Plainsman, and will also be announced over local radio stations. The draft permit is available for examination at the Sanders County Sanitarian's office, Sanders County Courthouse, Thompson Falls, Montana, phone 827-4396; Missoula City-County Sanitarian's Office, 301 West Alder Street, Missoula, phone 721-5700, ext. 364; the Plains Public Library, 108 West Railroad, Plains, phone 826-3101; and at the Solid and Hazardous Waste Bureau, Montana Department of Health and Environmental Sciences, Room B-201, Cogswell Building, Capitol Station, Helena, MT 59620, phone 444-2821.

A hearing will be held to present information and record comments on the draft permit. The hearing will be held on Wednesday, November 2, 1988 at 7:00 p.m., at the Paradise Grade School in Paradise.

An informal meeting to discuss the draft permit and hazardous waste issues at Paradise will be held immediately following the hearing.

BJ/vg-052





B.N. PARADISE PART I

SITE LOCATION

MAP BY: RLN DATE: 10/14/85
PROJECT BY: F-11 D-896

ERT

ENVIRONMENTAL RESEARCH TECHNOLOGIES, INC.

